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Department of Energy
Richland Operations Office
P.O. Box 550
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OCT 20 2003

04-RCA-0005

Mr. Allen W. Conklin, Supervisor
Air Emissions and Defense Waste Section
Washington State Department of Health
P.O. Box 47827
Olympia, Washington 98504

Mr. Jeff KenKnight
Federal and Delegated Air Program Unit
Office of Air Quality
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue OAQ-107
Seattle, Washington 98101

Dr. Oliver S. Wang
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West Fourth Avenue
Kennewick, Washington 99336

Addressees:

TRANSMITTAL OF NOTICE OF CONSTRUCTION FOR TRANSURANIC (TRU) WASTE
RETRIEVAL PROJECT, REV. 2A

Enclosed for Washington State Department of Health (WDOH) review and approval is the Transuranic (TRU) Waste Retrieval Notice of Construction (NOC), Revision 2A application (Enclosure 1). This revision replaces the previously submitted Revision 2 that has not been approved. Additionally, the revision responds to the information request from the WDOH via AIR-03-811. EPA approval of Enclosure 1 is not requested because, in accordance with the 40 CFR 61, no modification of the affected stationary source is expected to occur (i.e. no increase in the potential for air emissions). WDOH approval is requested because, in accordance with the WAC 246-247, a minor new emission unit will be introduced.

As agreed to in the August 25, 2003, meeting with John Schmidt, WDOH, this response provides text indicating that no credit will be taken for the abatement factor for fixatives and similar controls. In addition, the accident scenario has been removed from the Notice of Construction (NOC) application.

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Radiological survey plans and the high efficiency particulate air (HEPA) filter specifications for the drum venting system were requested by Mr. Schmidt during the meeting on August 25, 2003. These draft documents (TRU Retrieval Project Survey Plan, 2003-RSP-TRU-01; Daily Radiation Survey Task Description, TRU-03-D001; Weekly Survey Task Description, TRU-03-W001; and the drum venting system HEPA filter specifications) were provided to Mr. Schmidt on September 9, 2003.

Enclosure 2 is a revision to the Notification of Off-Permit Change to incorporate the NOC for potential radioactive air emissions from TRU waste retrieval activities, reflecting the agreed upon changes. This information is being provided to the State of Washington Department of Ecology, consistent with their role as lead for the Hanford Site Air Operating Permit. If you have any questions, please contact me, or you may contact Mary Jarvis, Regulatory Compliance and Analysis Division, on (509) 376-2256.

Sincerely,



Keith A. Klein
Manager

AMCP:MSF

Enclosures:

1. Notice of Construction Application
2. Notification of Off-Permit Change

cc w/encls:

N. Ceto, EPA
R. H. Engelmann, DFSH
E. W. Fordham, WDOH
R. D. Greenwell, DFSH
R. H. Gurske, FHI
S. Harris, CTUIR
J. E. Hyatt, FHI
R. Jim, YN
R. E. Johnson, FHI
G. L. Robertson, WDOH
J. W. Schmidt, WDOH
P. Sobotta, NPT
M. A. Wilson, Ecology
Admin Record
Environmental Portal, LMSI

ENCLOSURE 2

HANFORD SITE AIR OPERATING PERMIT

Notification of Off-Permit Change

Permit Number: 00-05-006

This notification is provided to State of Washington, Department of Ecology, State of Washington, Department of Health (WDOH), and the U.S. Environmental Protection Agency (EPA) as notice of an off-permit change described as follows.

This change is allowed pursuant to Washington Administrative Code (WAC) 173-401-724(1) as:

1. Change is not specifically addressed or prohibited by the permit terms and conditions
2. Change does not weaken the enforceability of the existing permit conditions
3. Change is not a Title I modification or a change subject to the acid rain requirements under Title IV of the Clean Air Act.
4. Change meets all applicable requirements and does not violate and existing permit term or condition
5. Change has complied with applicable preconstruction review requirements established pursuant to Regulatory Code of Washington 70.94.152.

Provide the following information pursuant to WAC-173-401-724(3):

Description of the change:
A Radioactive Air Emissions Notice of Construction, <i>Radioactive Air Emissions Notice of Construction the Transuranic Waste Retrieval Project</i> , Revision 2A, is being submitted to the WDOH and the EPA, Region 10, for approval. A change in the Hanford Site Air Operating Permit is required to incorporate this revision to a previous notification of a new potential source of air emissions.
Date of Change:
Effective date will be the later of the two approvals by WDOH or EPA.
Describe the emissions resulting from the change:
The unabated dose from point source emissions is 4.6 E-2 millirem per year and the abated dose is 2.3 E-5 millirem per year. The unabated dose from diffuse and fugitive emissions from normal operations is 7.4 E-3 millirem per year and the abated dose is 4.3 E-3 millirem per year.
Describe the new applicable requirements that will apply as a result of the change:
Applicable requirements will be identified in approval notifications by WDOH.
For Hanford Use Only:
AOP Change Control Number:
Date Submitted: